



TERESA JORDAN  
3152 SHAD COURT  
SIMI VALLEY, CA 93063  
TELEPHONE NO. (805) 522-5016

TO: Fethi Benjema  
Department of Water Resources  
901 P Street, Suite 313A  
Sacramento, CA 95814  
FAX NO.: (916) 651-7059  
DATE: June 27, 2011  
NO. OF PAGES: 3 (includes cover sheet)  
RE: OAL File No. 2011-0624-01E  
--DWR Proposed Emergency Agricultural  
Water Measurements Regulations (Title 23,  
Division 2, Chapter 5.1, Article 2, Sections 597,  
597.1, 597.2, 597.3, and 597.4).

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June 27, 2011

Fethi Benjemaa  
Department of Water Resources  
901 P Street, Suite 313A  
Sacramento, CA 95814

and

Office of Administrative Law  
Reference Attorney  
300 Capitol Mall, Suite 1120  
Sacramento, CA 95814

Re: Department of Water Resources Proposed Emergency  
Agricultural Water Measurements Regulations--Title  
23, Division 2, Chapter 5.1, Article 2, Sections 597,  
597.1, 597.2, 597.3, and 597.4 (OAL File No. 2011-0624-  
01E).

Dear Fethi Benjemaa, and OAL Reference Attorney:

The following are my comments on the aforementioned  
subject.

PROPOSED EMERGENCY REGULATIONS DOCUMENT

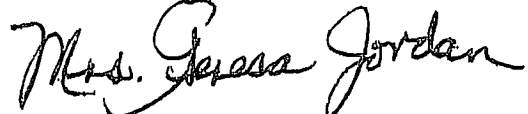
- #1 - Page 3, under Section 597.2. Definitions, add definitions for "Accuracy Certification", "Agricultural Water Management Plan", "Agricultural Water Management Plan Cycle", "Agricultural Water Measurement", and "Efficient Water Management Practices".
- #2 - Page 8, under Section 597.4(c) Records Retention, it is stated "Records documenting compliance with the requirements in" Section "597.3 and" Section "597.4 shall be maintained by the agricultural water supplier for ten years or two Agricultural Water Management Plan cycles". It is stated on Page 2 under number "3" that "The Department shall report on the

availability of new commercially available water measurement technologies and impediments to implementation of this Article when reporting to the Legislature the status of adopted Agricultural Water Management Plans in plan submittal years 2012, 2015 and every five years thereafter as required by California Water Code" Section "10845. The Department shall also report the findings to the California Water Commission". This statement indicates that the first two Agricultural Water Management Plan cycles would be 2012 and 2015, not 2015 and 2020. This will result in the retention of records for a shorter time span. I don't agree with a shorter time span. The language needs to indicate the five-year cycle after 2015.

NOTICE OF PROPOSED EMERGENCY RULEMAKING

- #1 - The pages are not numbered making it difficult to refer to individual pages.
- #2 - Telephone and facsimile numbers are not included in the contact information. Not all interested persons participate via e-mail, and with the state of the U.S. Postal Service's funding quagmire public comments may not arrive by the specified deadline (Page 2).
- #3 - Why does the contact information on Page 2 for the Department of Water Resources differ from the name given in the OAL's NOTICE PUBLICATION/REGULATIONS SUBMISSION EMERGENCY Form--Kent Frame; not Fethi Benjemaa?

Sincerely,



Mrs. Teresa Jordan